EXHIBIT 15

CONFIDENTIAL PURSUANT TO THE PROTECTIVE ORDER

1   UNITED STATES DISTRICT COURT

2   NORTHERN DISTRICT OF CALIFORNIA

3   SAN JOSE DIVISION

4

5   CISCO SYSTEMS, INC.,

6   Plaintiff,

7   vs.   No. 5:14-cv-05344-BLF(PSG)

8   ARISTA NETWORKS, INC.,

9   Defendant.

     _____/

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12   CONFIDENTIAL PURSUANT TO THE PROTECTIVE ORDER

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14   VIDEOTAPED DEPOSITION OF TONG LIU

15   FRIDAY, JANUARY 15, 2016

16   PALO ALTO, CALIFORNIA

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21   Reported by:

22   ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR

23   CSR LICENSE NO. 9830

24   JOB NO. 2211574

25   Pages 1 - 215

1   It is 2:19.

2   Please don't forget your mics.

3   (Recess taken.)

4   THE VIDEOGRAPHER: We are back on the record.

5   This is the beginning of Disc 3 in Volume I

6   in the deposition of Ms. Liu.

7   It's 2:32.

8   MR. WONG: Q. Ms. Liu, can you turn to

9   page '601 on Exhibit 98, please.

10   A   '601. (Witness complies.) Okay. Yes.

11   Q   This page '601 at the top says "show PTP

12   clock."

13   Do you see that?

14   A   Yes.

15   Q   And that's one of the commands that you are

16   associated with in Exhibit 92; correct?

17   A   Right.

18   Q   At the bottom of page '601, there's an

19   "examples" line.

20   Do you see that?

21   A   Yes.

22   Q   And it says:

23   "This example shows how to display the PTP

24   clock information."

25   Do you see that?

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1   A   Uh-huh.

2   Q   And below that, there looks to be, I guess,

3 an example of what happens when you enter in that

4 command.

5   Do you see that?

6   A   Yes.

7   Q   Is that an accurate description of what is

8 displayed there?

9   A   Yes.

10   Q   Okay. Were you responsible for choosing what

11 displays when you enter the "show PTP clock" command?

12   A   Yes.

13   Q   Okay. Was that part of just developing this

14 function -- I'm sorry -- this command?

15   MR. PAK: Objection; vague.

16   MR. WONG: Let me rephrase the question.

17   Q   Was creating the output of the "show PTP

18 clock" command part of your development work on this

19 command?

20   A   It was part of it.

21   Q   How did you decide what to include in the

22 output of the "show PTP clock" command?

23   A   Based on my understanding of how it works.

24 And I think I chose the most important fields that I

25 think would be meaningful to show to the user.

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1   Q   And when you say "most important fields," you

2   mean most important fields that are part of the PTP

3   standard?

4   MR. PAK: Objection; vague; mischaracterizes

5   the witness' testimony.

6   THE WITNESS: I believe this was part of a

7   personal choice. It may not have been -- how to

8   say -- it may not be a complete set of what can be

9   displayed for the clock. But I think these other

10 ones, which user may care about about the clock.

11   MR. WONG: Q. How did you make the

12 distinction between what you thought the user would

13 care about and what the user wouldn't care about for

14 the "show PTP clock" command?

15   A   It's based on my understanding of the spec

16 and what we have implemented. We didn't implement the

17 complete spec. We implemented the major functionality

18 of PTP clock.

19   Q   And how long, approximately, did it take for

20 your team to implement the portions of the PTP

21 standard that you actually did implement for the Cisco

22 device?

23   A   Again, I don't recall exactly. Three months,

24 five months. It's -- it's in that frame. Maybe a few

25 months.

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